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rendering the gratuitous services is always considered a proper element of damages. *Dean v. Wabash R. Co.*, 229 Mo. 425, 129 S. W. 953. Also, where the services were rendered in a professional capacity, it has been held that their value is admissible in evidence although they were rendered by a member of the plaintiff's family. For example, where the person rendering the services was a professional nurse. *Kimball v. Northern Electric Co.*, 159 Cal. 225, 113 Pac. 156.

But the better view, and the one upheld by perhaps a majority of the courts is that the value of gratuitous services is admissible in evidence although the services were rendered by a member of the plaintiff's family. *Wells v. Minneapolis Baseball, etc., Ass'n*, 122 Minn. 327, 142 N. W. 706, 46 L. R. A. (N. S.) 606, Ann. Cas. 1914D, 922; *Varnham v. City of Council Bluffs*, *supra*. The services thus gratuitously and voluntarily rendered are intended for the benefit of the plaintiff and not for the benefit of the defendant. See *Wells v. Minneapolis Baseball, etc., Ass'n*, *supra*.

There is no Virginia case directly in point. In the case of *Norfolk Ry. and Light Co. v. Spratley*, 103 Va. 379, 49 S. E. 502, a judgment in the lower court that money expended by a mother for medical attention to her child could be recovered in an action by the child was allowed to stand, the court refusing to discuss the point involved because no exception was properly taken.

FORFEITURES—PROPERTY OF INNOCENT PERSONS USED IN VIOLATION OF LAW.—The driver of an automobile brought intoxicating liquors into the State in violation of the law. In an information to enforce forfeiture of the automobile under the Prohibition Act of 1918, the defense was ignorance of the owner of the car of its unlawful use. Held, the automobile is forfeited. *Landers v. Commonwealth* (Va.), 101 S. E. 778. For discussion of principles, see NOTES, p. 583.

INTOXICATING LIQUOR—DAMAGES ALLOWED FOR MENTAL SUFFERING CAUSED BY UNLAWFUL SEARCH AND SEIZURE.—The plaintiff, while alighting from a train, intrusted her suit case to a transfer man, and a short time later the city marshal searched the suit case for alcoholic liquors supposed to belong to the transfer man over his protest and without a search warrant. An action for compensatory damages including mental suffering was brought. Held, mental suffering is a proper element of damages. *United States Fidelity and Guaranty Co. v. State* (Miss.), 83 South. 610.

This decision was based on a violation of the Bill of Rights relating to unlawful searches and seizures which the defendant, as city marshal, was presumed to know. A willful wrong having been committed, damages for resulting mental suffering were properly submitted to the jury. *United States Fidelity and Guaranty Co. v. State*, *supra*.

Damages for mental suffering have been allowed in cases of willful wrong, especially those affecting the liberty, character, reputation, personal security or domestic relations of the injured party. See *Western Union Tel. Co. v. Rogers*, 68 Miss. 748, 9 South. 823, 13 L. R. A. 859, 24